



State of California

Employment Training Panel

Arnold Schwarzenegger, Governor

November 30, 2008

Linda Blair Forth, President
Comprehensive Training Systems
497 11th Street Ste. 4
Imperial Beach, CA 91932

Dear Ms. Blair Forth:

RE: Final Monitoring REPORT for Comprehensive Training Systems (CTS) – ET07-0169

Date of the Visit:	11/12/08
Beginning/Ending Time:	10:30 a.m. – 1:00 p.m.
Date of Last Visit:	06/17/08
Visit Location:	San Diego (City Heights)
Persons in attendance:	Linda Blair Forth, President, CTS, and Carole Robinson, ETP Contract Analyst.
Action Required:	No

CONTRACT INFORMATION:

Term of Agreement:	11/15/06 – 11/14/08	Agreement Amount:	\$286,595
Training Start Date:	11/27/06	No. to Retain:	60
Date Training must be Completed:	08/13/08 (90-day retentions) 05/13/08 (180-day retentions)	Hours: Job 1 = 365 Job 2 = 312 Job 3 = 195 Job 4 = 168	
Type of Trainee:	New-Hire		

SACRAMENTO CENTRAL OFFICE
1100 J Street, 4th Floor
SACRAMENTO, CA 95814
(916) 327-5640

N. HOLLYWOOD REGIONAL OFFICE
4640 Lankershim Blvd., Suite 311
NORTH HOLLYWOOD, CA 91602
(818) 755-1313

S.F. BAY AREA REGIONAL OFFICE
1065 East Hillsdale Blvd, Suite 415
FOSTER CITY, CA 94404
(650) 655-6930

SAN DIEGO REGIONAL OFFICE
5353 Mission Center Road, Suite 110
SAN DIEGO, CA 92108
(619) 686-1920

www.etp.ca.gov
ETP (05/16/07)

FINAL REPORT SUMMARY:

• **HISTORY OF AGREEMENT CHANGES**

The Agreement was executed on 11/01/06 and training began on 11/27/06. You reported that all training was completed by 11/14/08 and that you will be requesting approval of retention outside the term of the Agreement for approximately 10 trainees. On November 3, 2008, you submitted this request to the San Diego Field office, however, after careful review of the request during the Final Monitoring Visit, you determined that CTS incorrectly included names of trainees who did complete retention within the term (11/14/08, and did not provide enough information for the remaining trainees for ETP to process the request. You agreed that CTS will resubmit the request with information for each trainee that includes, name, last four number of SSN, date trainee was placed, name of employer and CEAN, and date retention has or will be completed.

There were no Modification or Amendment requests initiated by CTS during the term of this Agreement.

• **INTERVIEW WITH COMPANY REPRESENTATIVE**

You stated that administration of this Welfare to Work (W2W) Pilot Project Agreement was difficult for several reasons. First, each participant usually had more than one case manager, each with a different agenda for their regarding training and employment requirements. The “outsourced” case managers contracted by San Diego County to provide employment services pushed for trainees to attend Job Clubs and into training with CTS to meet County quota requirements. This resulted in inappropriate referrals to CTS for participants that had no serious intention of completing training and finding fulltime employment. You reported that, although CTS conducted informational sessions with the case managers to discuss ETP requirements, extensive screening with each referral had to be completed to weed out those that really didn’t want to take advantage of the training opportunities offered by CTS.

In addition to the aforementioned problems with inappropriate referrals, you stated that the County contracted “outsourced” case managers experienced extremely high turnover which made communication sporadic and employment placement activities difficult with CTS. You also reported a bizarre situation in which a trainee completed CTS training after a lengthy period, was granted a waiver to seek work based on “stress” by her County contracted Case Manager and then immediately enrolled in another training program. You also informed Ms. Robinson that some trainees immediately became pregnant following completion training and were never placed into employment as a result.

You reported that even with the administrative difficulties CTS experienced with this W2W Pilot Project, many participants found meaningful fulltime employment with earnings between \$10 and \$18 per hour and are no longer receiving Cal WORK’s benefits.

PROJECT STATUS PROVIDED BY THE CONTRACTOR:

Job Numbers	Number Started Training	Number Enrolled in Training	Number of Trainees Dropped (following enrollment)	Number of Trainees Completed Minimum Hours	Number of Trainees Completed all Training (in retention)	Number of Trainees Completed Retention
1 - 4	66	66	3	63	UNK	UNK

- According to contractor records as of the date of this report, CTS may retain up to 47 retrainees (78%) of the planned retentions. The number of retention will depend on reconciliation of CTS's records, submission of a waiver request for retention outside the term of the agreement, and confirmation with employers that ETP retention and wage requirements have been met. Reimbursement will vary based on the cost per trainee established in each of the four Job numbers for this Agreement. Current records show that CTS has received \$123, 729 in approved earned Final payments and that an additional \$26, 334 are being processed by ETP for Final Payment for a potential to date, of \$135,588.25 in earned payments.
- CTS must drop any remaining retrainees who are enrolled but did not complete at least 80% of the training hours by Job number during closeout of the Agreement.
- Ms. Robinson informed you that CTS must submit a closeout invoice for this agreement no later than 12/14/08 or 30 days following the end of retention if an alternative date, outside the term of the Agreement, is approved by ETP.

ATTENDANCE ROSTERS:

Ms. Robinson reviewed class/lab attendance rosters for six randomly selected trainees enrolled in Jobs 1 through 4. She compared the rosters to the Agreement's Curriculum and checked to ensure that each roster contained the necessary information required by ETP, under Title 22, California Code of Regulations, 4442. She also compared the information on each roster with the hours submitted for Enrollment (Progress Payment 1), Completion (Progress Payment 2), and Completion (Final) on Invoice numbers 17 through 22 for the six selected trainees. Ms. Robinson noted that CTS uses in-house tracking and did not utilize the ETP On-line Enrollment and Tracking Systems for the Agreement.

Ms. Robinson found that the all Class/lab records reviewed for the six trainees contained the necessary information required by ETP and the Class topics matched those contained in the Agreement's Curriculum. The review of the above sample also verified that the hours reported on CTS's in-house tracking records matched those contained within the applicable Class/lab Rosters and numbers 1, 2, and 3 for Enrollment (Progress Payment 1), Completion (Progress Payment 2), and Completion (Final).

AUDIT:

CTS will be notified in writing if this agreement is selected for an audit that will be conducted either at your site (field audit) or by telephone if selected for a desk audit (or "review"). These notifications

will be sent in advance to allow ample preparation time and will include a list of documentation that will be examined by the auditor. A list of the documentation typically examined during an audit will be included along with the Audit Notification and Audit confirmation letters. To provide support of training, original training attendance documentation is required; photocopied records are not acceptable. Listed below are types of records typically requested during an ETP field audit:

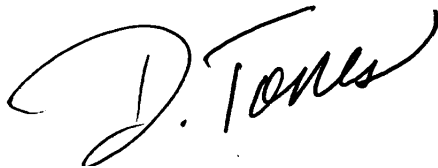
- Training attendance records such as rosters, sign-in sheets, etc.
- Payroll records of individual trainees to verify wage and hours worked
- Personnel records regarding occupation and dates of employment
- Documentation of employer paid health benefits (if applicable)
- Cash receipts to verify receipt and accounting of ETP funds

RECORD RETENTION:

Records must be retained within your control and be available for review at your place of business within the State of California. This responsibility will terminate no sooner than four (4) years from the date of the termination of the Agreement or three (3) years from the date of the last payment by ETP to the Contractor, or the date of resolution of appeals, audits, claims, exceptions, or litigation, whichever is later.

If you have any questions or comments regarding the information contained in this letter, please contact Carole Robinson at CRobinson@ETP.ca.gov or (619) 686-4971, within ten (10) working days from the receipt date of this letter.

Sincerely,



Diana Torres, Manager
San Diego Field Office



Carole Robinson, Contract Analyst
San Diego Field Office

cc: Kulbir Mayall, ETP Fiscal Manager
Master File
SD Project File

Date report e-mailed to Contractor: 12/02/08